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Letter motion (Doc 78) is DENEID as moot.  
Letter motion (Doc 81) is GRANTED to the  
extent of extending the date of completion of  
discovery to July 29, 2022 (FINAL). The Court  
expresses no view on Landstar's proposed  
course of action. July 27 conference is  
adjourned to September 8, 2022 at 3:00 p.m.  
Call-In No.: 888 363 4749. Access Code: 3667981.  
**SO ORDERED.**

Dated: 7/7/2022

George W. Wright\*  
Narinder S. Parmar\*

July 5, 2022

P. Kevin Castel  
United States District Judge

**VIA ECF**

Hon. P. Kevin Castel, U.S.D.J.  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street, Room 11D  
New York, NY 10007-1312

**Re: UIH Technologies LLC v. Kuehne +  
Nagel Inc. v. Landstar Ranger, Inc.  
Next Conference Date: June 15, 2022  
Civil Action No. 21-cv-3429 (PKC) (JW)**

Honorable Sir:

We are counsel for third-party defendant Landstar Ranger, Inc. ("Landstar") and write to respectfully request a brief extension of the fact discovery deadline from July 11 to July 29, 2022. The Court previously extended discovery up to July 11, 2022 (D.E. 77).

The purpose of the instant request is to enable the parties to complete certain outstanding discovery before a settlement conference which the parties agree may be scheduled with a Magistrate Judge no later than August 12, 2022.

In light of the recent deposition of plaintiff's damages witness, Landstar wishes to conduct an inspection of the subject MRI machine in Houston, TX this month. Our office has requested plaintiff to produce specific records relating to the testing of the MRI since its alleged damage. In addition, the parties need a brief extension to complete the depositions of two (2) of defendant K+N's corporate representatives, a Landstar agent representative and resolve several other outstanding document requests.

Lastly, Landstar has had to engage local counsel in Louisville, Kentucky and Houston, Texas to file motions to enforce five (5) subpoenas served in May and

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June on non-parties for testimony and records that are returnable on or before the July 11 discovery deadline. The non-parties in question are the involved motor carrier's owner and driver in Louisville as well as two (2) former K+N employees and another person, Ms. Yesica Coronado, in Houston. These individuals have been uncooperative with Landstar's efforts to conduct the depositions of the motor carrier's and K+N's representatives and compel Ms. Coronado's production of documents she identified in her recent deposition.

We have advised counsel for plaintiff and K+N of this request and plaintiff consents to same. K+N contends it is too late for Landstar to enforce its non-party subpoenas to K+N's knowledgeable former employees.

We thank you for your attention and consideration.

Respectfully submitted,

George W. Wright

GWW:ds

cc. Mark T. Coberly, Esq. (Via ECF)  
Dustin M. Paul, Esq. (Via ECF)  
Gaela R. Normile, Esq. (Via ECF)  
Andrew R. Spector, Esq. (Via ECF)  
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